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OFFICE OF THE SECRETARY

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	PR Docket No. 92-289
)	
Amendment of the Amateur Service)	(RM-7888)
Rules Concerning the 222-225 MHz)	(RM-7868)
and 1240-1300 MHz Frequency Bands)	(RM-7869)

**COMMENTS OF THE MANAGER
OF THE NATIONAL COMMUNICATIONS SYSTEM**

The Secretary of Defense, Executive Agent of the National Communications System (NCS)¹, through duly authorized counsel, pursuant to Section 201 of the Federal Property and Administrative Services Act of 1949, 40 USC Section 481, and the Memorandum of Understanding between

¹Executive Order No. 12472, "Assignment of National Security and Emergency Preparedness Telecommunications Functions," April 3, 1984 (49 Fed. Reg. 13471, 1984), established the National Communications System (NCS), which consists of an administrative structure involving the Executive Agent, Committee of Principals, Manager, and the telecommunications assets of the Federal organizations which are represented on the Committee of Principals. Section 1(e) of Executive Order 12472 designates the Secretary of Defense as Executive Agent for the NCS. By direction of the Executive Office of the President (EOP), the NCS members organizations (which are represented on the Committee of Principals) are: Department of Agriculture, Central Intelligence Agency, Department of Commerce, Department of Defense, Department of Energy, Federal Emergency Management Agency, General Services Administration, Department of Justice, National Aeronautics and Space Administration, the Joint Staff, Department of State, Department of Transportation, Department of Treasury, U.S. Information Agency, the Department of Veterans Affairs, Department of Health and Human Services, Department of the Interior, National Security Agency, the National Telecommunications and Information Administration and the Nuclear Regulatory Commission. The Federal Communications Commission, the United States Postal Service and the Federal Reserve Board also participate in the activities of the NCS. The vast majority of the telecommunications assets of these 23 organizations are leased from commercial communications carriers and serve the NS/EP needs of the Federal government as well as state and local governments.

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the Department of Defense and the General Services Administration dated November 27, 1950, hereby files these comments in response to the Notice of Proposed Rule Making (NPRM) captioned above. The Commission has proposed changes to Part 97 of its Rules in this proceeding to accomplish three results. It has proposed to create a small new subband where repeaters are prohibited, to authorize frequency privileges for Novice Class operators in the entire band, and to allow Novice Class operators to be licensees and control operators of repeaters in the 222-225 MHz band as well as in the 1270-1295 MHz segment of the 1240-1300 MHz band. Two proposals are advanced by the American Radio Relay League ("League"), the third by Dr. Michael C. Trahos.

First, the League believes that a new, small segment is needed where experimentation can take place but where frequencies need not be shared with repeaters. The League also believes expansion of the frequency privileges for Novice Class operators to encompass the entire 222-225 MHz band will be beneficial in that such operators will be exposed to routine types of amateur station operation other than repeater operation. Dr. Trahos requests that Novice Class operators be authorized to be licensees and control operators of repeaters in the 222-225 MHz and in the 1270-1295 MHz Novice subband, to make the amateur rules consistent with those of the General Mobile Radio Service and Private Land Mobile Radio Services.

The Secretary of Defense, for the Department of Defense and in his capacity as Executive Agent of the NCS, has historically filed comments in Commission proceedings in support of the activities of amateur radio

licensees.² The comments typically recite the value of amateur radio operators as a resource to be utilized by the NCS in carrying out its National Security/Emergency Preparedness (NS/EP) responsibilities. They also cite the June 2, 1983 Memorandum of Understanding between the NCS and the League which established a broad framework of cooperation and a close working relationship with amateur radio operators for national emergency communications functions.

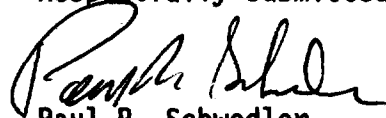
As the Commission stated on page 1 of the Notice of Proposed Rulemaking, "We believe that there is merit in these petitions. They offer improvements in the operational standards for the amateur service. The availability of a small protected subband at 220.00-222.15 would facilitate experimentation. Permitting Novice Class operators to be licensees and control operators of repeaters and authorizing them additional frequency privileges would provide an opportunity for Novice Class operators to become proficient in a wider variety of amateur service operations. They would also have more flexibility in selecting the mode of transmission. Choosing an appropriate mode would result in a more efficient use of available spectrum." The Manager of the NCS has examined the relatively minor changes proposed and has no objection to them. Rather, it is believed these changes will result in greater proficiency and increased flexibility on the part of the amateurs in support of NSEP communications and will advance the degree of cooperation between the amateurs and the NCS envisioned in the previously referenced Memorandum of Understanding.

²See, for example, Manager's Comments in Docket 87-14 and in RM-7747, and in PR Docket 92-136.

CONCLUSION

The Manager of the NCS therefore has no objection to the rule changes proposed by the Commission. The participation of amateur radio operators in NS/EP related functions has benefitted the nation's NS/EP posture and amendment of the rules as proposed would enhance the ability of amateur radio operators to continue to respond in NS/EP situations.

Respectfully submitted,



Paul R. Schwedler
Assistant Chief Regulatory Counsel
(703) 692-8457



Carl Wayne Smith
Chief Regulatory Counsel,
Telecommunications, DOD
Code AR
Defense Information Systems Agency
701 S. Courthouse Road
Arlington, Virginia 22204